

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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LILLIAN FEILER,

Plaintiff(s),

**AFFIDAVIT**

-against-

Index No.: 07/CIV 3938

TARGET CORPORATION a/k/a TARGET STORES,

Defendant(s).

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**JASON F. ZIMMERMAN**, an attorney duly admitted to practice before the courts of this State, and a member of the law firm of FELDMAN, KRAMER & MONACO, P.C., attorneys for Plaintiff, affirms the following to be true under penalty of perjury:

This Affirmation is submitted in opposition to Defendant's Removal Petition to have the case now pending in the Supreme Court of the State of New York, Bronx County, be moved to this Honorable Court.

The case herein does not meet the \$150,000.00 threshold and Defendant has set the Jurisdictional limit at \$75,000.00.

Defendant has never offered more than \$17,500.00 in this case and the case does not belong in Federal Court but should remain in the Supreme Court, Bronx County.

The case will settle for far less then \$150,000.00

**WHEREFORE**, affirmant respectfully requests that the within case be returned to the Supreme Court of the State of New York, County of Bronx, with such other, further, and different relief as to this Court seems just and proper.

DATED: Hauppauge, New York  
September 27, 2007

/s/ Jason F. Zimmerman  
JASON F. ZIMMERMAN